

# **EXHIBIT B**

**From:** Steven Moser [steven.moser@moserlawfirm.com](mailto:steven.moser@moserlawfirm.com)  
**Subject:** RE: Alvarez Chicas et al. v. Kelco Construction, Inc. et al. - CONFIDENTIAL SETTLEMENT COMMUNICATION  
**Date:** March 1, 2024 at 11:58 AM  
**To:** Previn Waran [pwaran@graelaw.com](mailto:pwaran@graelaw.com)  
**Cc:** Mark Grae [mgrae@graelaw.com](mailto:mgrae@graelaw.com), Casey Rahn [crahn@graelaw.com](mailto:crahn@graelaw.com)

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Previn

Rather than me proposing dates to find out that Kelly and Provenzano are not available, please furnish dates when you and your clients will be available for depositions.

The number offered is a non-starter. I was under the impression that you were offering [REDACTED] to each of the named plaintiffs. I'm glad I didn't propose that to them.

I encourage the defendants to furnish the damage calculations that they professed to have at the mediation, or to prepare and furnish such calculations now. We will ask for the answer by Friday of next week so that we can serve the 30(b)(6) notice, which, as I mentioned to you, is dependent upon the responses to the amended pleading.



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